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**PROPOSED RULEMAKING**

2013 DEC 27 AM 8:53

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**HOUSEHOLD GOODS IN USE CARRIERS AND PROPERTY CARRIERS**

**43 PaB 6894**

As a Household Goods Carrier operating three full service agencies domiciled in Pennsylvania with operating authority in twenty counties and to the best of our knowledge the only carrier with State wide authority within Pennsylvania, we have objections with a few of the suggested Rule changes as prescribed by the Pennsylvania Public Utility Commission dated September 12, 2013.

**41.14** Evidentiary criteria used to decide motor common carrier applications:

We agree that it is appropriate to eliminate that an applicant for household goods in use authority establish that approval of the application will serve a public purpose, responsive to a public demand or need.

We also agree that an applicant seeking motor carrier authority demonstrates that it possesses the technical and financial ability to provide the proposed service as well the propensity to operate safely and legally based on the fitness standards prescribed by the commission.

We disagree that any carrier or entity that meets the above criteria be granted operating authority without having a facility and personnel domiciled within Pennsylvania. Allowing easy entry for all carriers would allow moving firms from other states as well as Third Party providers, the opportunity to secure business within Pennsylvania and eliminating employment opportunities for tax paying citizens of Pennsylvania. We also believe it would provide a venue for Rogue Movers from other states access to unknowing consumers shopping on line for local and intra state moves. We feel fines for these Rogue Movers should be significant beginning with the very first offense.

**23.67** Proposed elimination Threshold amounts:

We agree with the elimination of any threshold amounts in an effort to price our services accordingly. We would like the opportunity as we currently have with our Interstate business to price our business within Pennsylvania seasonally allowing price increases during the very busy times, usually June through August and the last weeks of each month as well as reducing our rates during off peak periods. This would allow consumers an opportunity to adjust their moving dates accordingly to receive a benefit in price as well as ease the significant work load during peak periods thus providing a higher quality of moving service to the consumer.

It's our opinion that the Rule Changes being proposed are to encourage a competitive environment within Pennsylvania allowing consumers more choices when choosing their moving firms. Without an opportunity to provide seasonal price adjustments, we hamper that competitiveness and the quality of the services provided.

**State wide operating Authority**

**We are opposed to granting State wide operating authority primarily for the negative financial effect it would have on Carriers such as ourselves that over the years secured operating authority within Pennsylvania at a very significant expense. Many of these purchases were of smaller moving companies primarily for their authority being that was normally their only major asset. Allowing statewide authority eliminates this value and significantly reduces the value of all Pennsylvania Moving companies.**

**In our situation, our 2012 balance sheet reflects our Pennsylvania operating authority has a value of \$140,000.00. If the proposed Rules become effective, our authority would be worthless. A fact all Pennsylvania Movers would need to face.**

**We realize change is inevitable and our industry is not immune from changes but it's our humble opinion to look what has occurred with changes in the Interstate Household goods Industry over the recent years. Ease of Entry certainly encouraged the activities of the Rogue Movers giving access to a larger scope of unsuspecting consumers through online purchasing. But it has also permitted the professional movers to finally price their business accordingly to help ease excessive over loads thus providing a higher quality of service to the moving consumer.**

**We feel it important to protect the Pennsylvania Consumer from the Internet or Rogue Movers thus suggesting significant fines and to keep all employment opportunities within the Commonwealth, thus our suggestion Carriers operating within Pennsylvania be domiciled in Pennsylvania.**

**Sincerely:**

**John Babusci  
Parks Moving and Storage**